

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DONALD RENKOWIC
PLAINTIFF.

CIVIL ACTION
NO. 04 CV 30202-MAP

Vs.

FRANKLIN COUNTY HOUSE OF CORRECTION AND
JAIL, SHERIFF FREDERICK MACDONALD, ET., AL;.

MOTION TO COMPEL PRODUCTION, INSPECTION, AND COPYING OF
DOCUMENTS IN CASE OF OBJECTIONS OR FAILURE TO RESPOND

THE PLAINTIFF DONALD RENKOWIC, MOVES THE COURT FOR AN ORDER REQUIRING THE DEFENDANTS TO PRODUCE, AND TO PERMIT THE PLAINTIFF TO INSPECT, AND TO COPY OR PHOTOGRAPH, EACH OF THE FOLLOWING DOCUMENTS IN HIS (6) SIX PART FOLDER ; AND THE FRANKLIN COUNTY SHERIFFS OFFICE GENERAL ORDER(s) , INCLUDING POLICIES AND PROCEDURES FOR SUCH CODE OF MASSACHUSETTS REGULATIONS ;

- 1.) REQUEST FORMS, ANY AND ALL FROM JUNE 11,2004, THROUGH PRESENT TIME CONCERNING INMATE RENKOWIC.
- 2.) GRIEVANCE FORMS , ANY AND ALL, FROM JUNE 11.2004, THROUGH PRESENT TIME CONCERNING INMATE RENKOWIC.
- 3.) DISCIPLINARY REPORTS, AND HEARING DOCUMENTS, ANY AND ALL FROM JUNE 11,2004, THROUGH PRESENT TIME CONCERNING INMATE RENKOWIC.
- 4.) MEDICAL RECORDS, ANY AND ALL , FROM JUNE 11,2004, THROUGH PRESENT TIME CONCERNING INMATE RENKOWIC.
- 5.) FRANKLIN COUNTY SHERIFFS OFFICE GENERAL ORDERS, ANY AND ALL FOR THE FOLLOWING ; SANITATION REQUIREMENTS, CODE OF MASSACHUSETTS REGULATIONS ;

103 C.M.R. 902.01, DEFINITIONS, 103 C.M.R. 920.01 THROUGH 103 C.M.R.920.07 PHYSICAL PLANT, 103 C.M.R.926.01 THROUGH 103 C.M.R.926.04,


SPECIAL MANAGEMENT INMATES, 103 C.M.R. 973.01 THROUGH 103 C.M.R. 973.08, SAFETY AND EMERGENCY STANDARDS, 103 C.M.R. 974.01 THROUGH 103 C.M.R. 974.12, SANITATION AND HYGIENE,.

THIS MOTION IS MADE ON THE GROUND THAT THE PLAINTIFF SERVED A WRITTEN REQUEST UPON THE DEFENDANTS FOR PRODUCTION, INSPECTION, AND COPYING OR PHOTOGRAPHING THE ABOVE MENTIONED DOCUMENTS, A COPY OF WHICH IS ATTACHED HERETO AS EXHIBIT 'A', AND THAT THE DEFENDANTS OBJECTED TO SEND PRODUCTION BY NOT RESPONDING TO SAID REQUEST OR THAT THE DEFENDANTS HAS FAILED AND REFUSED TO RESPOND TO THE PLAINTIFFS REQUEST AS REQUIRED BY RULE 34, MASSACHUSETTS RULES OF CIVIL PROCEDURES.

THE DOCUMENTS REQUESTED BY THE PLANTIFF CONTAIN RELEVANT AND MATERIAL EVIDENCE IN THE ABOVE ACTION AND THEIR PRODUCTION IS NECESSARY FOR THE PLAINTIFF TO PREPARE FOR A NEW CIVIL ACTION OR TRIAL

DATE; 9-28-04

RESPECTFULLY SUBMITTED,



DONALD RENKOWIC, PRO SE
160 ELM STREET
GREENFIELD, MASS. 01301.

Commonwealth of Massachusetts
Office of the Sheriff
Franklin County

TO SEE:
(para ver)

- ☒ Superintendent Byron
☒ Deputy Superintendent Fitzpatrick
☐ Deputy Superintendent Hall
☐ Deputy Superintendent Shepherd, Jr.
☐ A.D.S. Swartz
☐ Captain Ballard
☐ Captain Brown
☐ Captain Hill
☐ Captain Schindler
☐ Captain Troczynski
☐ Captain Waldron
☐ Lieutenant Zewski
☐ C.O. Carme
☐ C.O. LaBelle
☐ C.O. Togneri
☐ Mr. Chronney
☐ Mr. Downey
☐ Ms. Fortin
☐ Ms. Lovett
☐ Mr. Quinn-O'Connor
☐ Mr. Parziale
☐ Mr. Rathschmidt
☐ Mr. Sabella
☐ Ms. Sarceno
☐ Ms. Water
☐ Parole
☐ Other
- Classification*
Shift Captain
Shift Captain
Shift Captain
Shift Captain
Shift Captain
Shift Captain
Records *
- Block Jobs*
Block Jobs
Property
RSAT
Education
Good Time
Inmate Accounts
C.D.C.
Director Clinical Services
Education
Inner Strength
Substance Abuse Coordinator
Classification Manager

INMATE REQUEST FORM

Peticion De Los Confinados

INMATE NAME: Donald Benkovic DATE: 8 10 04
NOMBRE DEL CONFINADO FECHA

- ☐ House Block/East
☐ Modular Unit
☒ House Block/West
☐ Special Unit
☐ Jail Block
☐ Women's Ward

STATE NATURE OF REQUEST:
EXPLIQUE SU PETICION

*Mr. Fitzpatrick I would like to
Review my 6 per Folder and I would like to
have copies made of such documents - Request for
Grievance Forms, Disciplinary Reports, medical Records*

REPLY TO REQUEST:
REPUESTA A LA PETICION

OFFICER'S SIGNATURE:

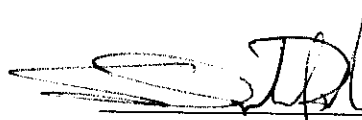
NOTARY PUBLIC AVAILABLE

INMATE'S COPY

FACILITY-10 (11/06/03)

CERTIFICATE OF SERVICE

I Donald Renkowicz PRO SE, HEREBY CERTIFY THAT ON THIS
28 DAY OF September 2004, I HAVE SERVED THE FOREGOING
DOCUMENTS BY MAILING FIRST CLASS, POSTAGE PREPAID, A TRUE COPY
OF SAME TO THE DEFENDANTS, AND THEIR ATTORNEY, AT THE
FOLLOWING ADDRESSES ;

A handwritten signature in black ink, appearing to read 'Donald Renkowicz', written over a horizontal line.

DONALD RENKOWIC, PRO SE